

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF PENNSYLVANIA**

**In re:**

**MBMK Property Holdings, LLC**  
**Debtor.**

**Chapter 11**

**Bankruptcy No.: 22-13121-mdc**

**MBMK Property Holdings, LLC,**  
**Plaintiff,**

**v.**

**Wilmington Trust, National Association, As  
Trustee for the Benefit of the Holders of  
Corevest American Finance 2018-2 Trust  
Mortgage Pass-Through Certificates; Bay  
Management Group of Philadelphia, LLC;  
James Paul, d/b/a James Paul of the ALPS  
Group; and, ALPS Group, Inc. d/b/a James  
Paul The ALPS Group,**

**Defendants.**

**Adv. Pro. No.: 23-00062-mdc**

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Notice is hereby given that on November 13, 2023 party in interest Wilmington Trust, National Association, as Trustee for the Benefit of the Holders of CoreVest American Finance 2018-2 Trust Mortgage Pass-Through Certificates (“Wilmington Trust”), filed a Motion to Dismiss Counts I, II, IV, and V of the Adversary Complaint for Failure to State a Claim (the “Motion”).

1. **Your rights may be affected.** You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

2. **If you do not want the court to grant the relief sought in the above-referenced Motion or if you want the court to consider your view on the Motion, then on or before November 27, 2023, you or your attorney must file a response to the Motion. (See Instructions on next page.)**

3. A hearing on the Motion is scheduled to be held before the Honorable Chief Judge Magdalene D. Coleman, **on December 13, 2023 at 11:30 a.m.** at the United States Bankruptcy Court, Courtroom No. 2, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.

4. **If you do not file a response to the Motion,** the court may enter an order granting the relief requested in the Motion.

5. You may contact the Bankruptcy Clerk's Office for Philadelphia case at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed a response.

6. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed below.

7. Copies of the Motion referenced above may be inspected in the Office of the Clerk of the Bankruptcy Court during normal business hours or downloaded from the Bankruptcy Court's website at [www.paeb.uscourts.gov](http://www.paeb.uscourts.gov). Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents through the Bankruptcy Court's website at <http://pacer.psc.uscourts.gov> or by calling (800) 676-6856. Requests for copies of the Motion and further information regarding the hearing may also be made to counsel for the Debtor at the telephone number and address listed below.

8. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.

9. If you are not required to file electronically, you must file your response at:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
Robert N. C. Nix, Sr. Federal Courthouse  
900 Market Street, Suite 400  
Philadelphia, PA 19107

10. If you mail your response to the Bankruptcy Clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.

11. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorneys:

D. Wesley Meehan, Esq.  
Gordon Rees Scully Mansukhani, LLP  
Three Logan Square  
1717 Arch Street, Suite 1610  
Philadelphia, PA 19103  
Phone: (973) 549-2504

David P. Cañas  
Gordon Rees Scully Mansukhani, LLP  
4031 Aspen Drive, Suite 290  
Franklin, Tennessee 37067  
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[wmeehan@grsm.com](mailto:wmeehan@grsm.com)

Dated: November 17, 2023

**GORDON REES SCULLY  
MANSUKHANI, LLP**

By: /s/ D. Wesley Meehan

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-and-

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*Attorneys for Wilmington Trust, National  
Association, as Trustee for the Benefit of the  
Holders of CoreVest American Finance 2018-2  
Trust Mortgage Pass-Through Certificates*